

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**[PROPOSED] PROTECTIVE ORDER**

Upon consideration of the United States' Motion for a Protective Order, it is hereby

**ORDERED** that:

- 1) The discovery materials produced by the government in this case may be used by the defendant, defendant's counsel and any employees or agents of defendant's counsel solely in the defense of this case and for no other purpose and in connection with no other proceeding;
- 2) Defendant's counsel and defendant will not disclose any discovery materials, directly or indirectly, to any other person except those assisting the defense, persons who are interviewed as potential witnesses, potential experts, or other authorized persons, during the course of the investigation and defense of this case;

3) Such discovery materials should not be copied or reproduced except as necessary to provide copies of the material for use by an authorized person as described above to prepare or assist in the defense, and all such copies and reproductions will be treated in the same manner as the original matter;

4) When providing the discovery materials to an authorized person, the defendant's counsel must inform the authorized person that the materials are provided subject to the terms of this Protective Order and that the authorized person must comply with the terms of this Protective Order;

5) Defendant's counsel will inform the defendant of the provisions of this Protective Order, and direct him not to disclose or use any information contained in the government's discovery in violation of this Protective Order;

Nothing contained in the Protective Order will preclude any party from applying to the Court for further relief or for modification of any provision hereof.

  
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JENNIFER C. BOAL  
UNITED STATES MAGISTRATE JUDGE

Dated: November 15, 2013